

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: DAVOL, INC. / C.R. BARD,  
INC. POLYPROPYLENE HERNIA  
MESH PRODUCTS LIABILITY  
LITIGATION**

**Case No. 2:18-md-2846**

**JUDGE EDMUND A. SARGUS, JR.  
Magistrate Judge Kimberly A. Jolson**

**This document relates to:**

***Milanesi, et al. v. CR Bard et al., No. 2:18-cv-1320***

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**PLAINTIFFS' MOTION TO TEMPORARILY SEAL PLAINTIFFS' OPPOSITION TO  
BARD'S MOTION TO EXCLUDE THE TESTIMONY OF PLAINTIFFS' EXPERT  
MICHAEL G. BEATRICE, PH.D.**

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Pursuant to Case Management Order No. 26-A (ECF No. 345), the PSC hereby seeks permission to file Plaintiffs' Opposition To Bard's Motion To Exclude The Testimony Of Plaintiffs' Expert Michael G. Beatrice, Ph.D. under seal in the event it cites to or references information that has been marked "Confidential" or "Highly Confidential" by Defendants pursuant to Case Management Order Nos. 7 and 7-A (ECF Nos. 48 and 190) (the "Underlying MIL Response").

As set forth in CMO No. 26-A, this Underlying Response will be temporarily sealed for a period of 7 days to allow an opportunity for judicial review. Further, CMO No. 26-A states that if the party or third party that produced the "Confidential" or "Highly Confidential" information fails to file a Motion to Seal the Underlying Response within 7 days of service, the Clerk shall promptly remove all the documents filed under seal and make them publicly available on the docket. ECF

No. 345, p. 2. Accordingly, the Underlying Response is filed temporarily under seal pursuant to CMO No. 26-A.

Dated: December 23, 2021

Respectfully submitted,

/s/ David J. Butler

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ David J. Butler  
***Plaintiffs' Liaison Counsel***